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REMARKS

Claims 1 - 24 remain active in this application. Claims 1, 7, 8, 11 - 14, 16, 17, 20, 23 and 24 have been amended to address formal matters raised by the Examiner. No new matter has been introduced into the application. The indication of allowability of claims 10 - 13 and 16 - 22, subject to overcoming rejections under 35 U.S.C. §112, is noted with appreciation. The withdrawal of objections to claims 20 - 22 and the rejections based on Fleskes are also noted with appreciation.

The Examiner has adhered to the rejection of claims 16 - 19 under 35 U.S.C. §112, second paragraph as containing an error. This ground of rejection is respectfully traversed, particularly as being moot in view of the amendment to claims 16 and 17 made above.

Applicant strongly disagrees with the Examiner's assertion of error in regard to the recitation of step (e)(3) of recursively performing steps (b) - (f). While it may, on first impression, seem illogical to recursively perform a sequence of steps beginning with a step which has not yet been performed, the recitation is substantively correct and is, in fact, logical and descriptive of the invention as disclosed for the reasons set forth in the previous response when it is considered that the steps (b) - (f) contain branches controlling nested looping within the sequence and all of such steps (b) - (f) may or may not be reached for each of a sequence of exited-to procedures being processed.

However, to expedite the prosecution of this application and in an effort to satisfy the Examiner on this point, claims 16 and 17 have been amended to limit the recitation of step (e)(3) to recursive processing of step (b) - (e) and more fully reciting the conditions under which step (f) is performed. It is

abundantly clear that steps (b) through (e) are recursively performed in a loop for a sequence of exited-to procedures and the recursive processing of steps (a) - (f) under the conditions of step (f) is recited within that step. Therefore, while it is believed that claims 16 and 17, as rejected, are correct and descriptive, claims 16 and 17 appear to remain correct while answering the Examiner's criticism. Accordingly, reconsideration and withdrawal of this ground of rejection is respectfully requested.

Claims 1 - 24 have been rejected due to an asserted inconsistency in claim 7 and insufficient antecedent language correspondence. This rejection is respectfully traversed as being moot in view of the amendments made above. Specifically, a reference to e-mail has been deleted from claim 7 and "DBMS" has been either spelled out with parenthetical acronym or changed to language having clear antecedent correspondence within the claim or a preceding claim at each and every occurrence noted by the Examiner. Accordingly, reconsideration and withdrawal of this ground of rejection is also respectfully requested.

Claims 1 - 5, 8 - 9, 14 - 15 and 23 - 24 have been rejected under 35 U.S.C. §103 as being unpatentable over Shimizu et al. in view of Mueller and claims 6 - 7 have been rejected under 35 U.S.C. §103 as being unpatentable over Shimizu et al. in view of Mueller and Davis et al. These new grounds of rejection are also respectfully traversed.

As pointed out in the previous response, "the invention is directed to the extraction of a portion of a hierarchical data structure forming an electronic media description, such as an interactive electronic technical manual (IETM), which may include a large number or complex network/web of internal cross-references at a large plurality of hierarchical levels and preserving that hierarchy and those internal cross-

references while making portions of the electronic media description accessible as web pages by, in essence, wrapping HTML or the like network compatible language around the specific data elements retrieved from the DBMS to generate web compliant relatively addressed tags (providing, in the process, an *unexpected ten-fold improvement* in presentation speed (see page 19, line 30) as well as infrastructure independence)." Moreover, the invention is *independent* of the particulars of any given authoring system, such as the authoring system to which Shimizu et al. is directed, (and which establishes a hierarchy of a hierarchical database - see prior art Figure 1 and the paragraph beginning at page 3, line 26, of the present application) and has the meritorious function of *preserving* the hierarchical structure and internal cross-references and links of the database while placing the information in a platform-independent form for facilitating navigation and retrieval.

In contrast, Shimizu et al. is directed to an authoring system in which a user may select a template in the form of an outline and then associate (apparently otherwise unordered) data in a card database with each of the slots of the outline template by linking the slot types with cards in the card database (see column 1, lines 60 - 65). Cards in the card database are information elements that contain so-called "hypermedia" information that will make up the document being authored and which can be video, sound or text but are not necessarily web pages. The Examiner admits that Shimizu et al. does not disclose that web pages (if, in fact, web pages are disclosed by Shimizu et al.) are tagged data relative web pages; thus glossing over the fact that, in accordance with the invention, tagged data relative web pages preserve the hierarchy and internal cross-references of the document when it is put in the form of web pages for

facilitating access and navigation in accordance with the invention.

The Examiner appears to rely on Mueller simply for associating HTML tags to multimedia data. However, Mueller is directed to a system which searches a HTML document for "association tags" which include "an index reference to the location of the stored information (Abstract, line 7) which is then retrieved and utilized by an application program. Therefore, it does not appear that Mueller produces web pages, much less tagged or data relative web pages "that preserve said hierarchy of said original electronic media description in said database structure" as recited, for example, in claim 1. That is, Mueller provides a tag which references an index, apparently in the nature of an absolute address (as contrasted with a relative address - see page 4, line 26, to page 5, line 21, of the present specification), and, in any event, does not preserve the hierarchy of any original document or database from which the tagged information is derived or retrieved. Therefore, Mueller does not supplement the teachings of Shimizu et al. at the point of admitted deficiency to answer the recitations of the claims or the other deficiencies of Shimizu et al. noted above. The combination of teachings of Shimizu et al. does not lead to an expectation of success in providing the meritorious function of the invention in preserving the hierarchy of the original document or database structure and thus does not provide evidence of a level of ordinary skill in the art which would support the conclusion of obviousness which the Examiner has asserted. Moreover, the Examiner does not even assert that Mueller teaches what is admittedly lacking from the teachings of Shimizu et al. ("tagged data relative web pages" without commenting on their function of preserving the hierarchy of the database) but only that "Mueller discloses associating HTML tags

to multimedia data"; thus failing to make a *prima facie* demonstration of the obviousness of any claim.

Davis et al. is apparently cited by the Examiner for teaching the exporting of relative web pages but does not assert that the teachings or suggestions of Davis et al. supplement the teachings of Shimizu et al. and/or Mueller at any of the points of deficiency noted above. Moreover, Davis et al. appears to be directed to making revisions in a hypertext document by sending a revision by e-mail containing revised data for a mark-up tag in an existing hypertext document. Therefore, Davis et al. is substantially contrary and irrelevant to the basic meritorious effect of the invention which the combined teachings of Shimizu et al and Mueller do not enable. Further, the e-mail revision is directed to a specific mark-up tag and does not answer the claim recitation of generating tagged data relative web pages (e.g. claim 1) which is not answered by Shimizu et al. and/or Mueller. Therefore, no *prima facie* demonstration of obviousness has been made.

Accordingly, it is respectfully submitted that Shimizu et al., Mueller and/or Davis et al. taken alone or in any combination do not support the conclusion of obviousness which the Examiner has asserted and no *prima facie* demonstration of obviousness has been made. Moreover, it is clear that the references relied upon do not demonstrate a level of ordinary skill in the art which would support a conclusion of obviousness of any claim in the application. Further, while there are deficiencies in the teachings which the Examiner has not recognized, even the admitted deficiencies are not mitigated by other prior art, as applied by the Examiner. Therefore, it is respectfully submitted that these grounds of rejection are in error and untenable and reconsideration and withdrawal thereof is respectfully requested.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,



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